

Exhibit B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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People of the State of New York, by LETITIA JAMES,
Attorney General of the State of New York,

Plaintiff,

-against-

Case No. 7:23-cv-04832

RED ROSE RESCUE, CHRISTOPHER MOSCINSKI,
MATTHEW CONNOLLY, WILLIAM GOODMAN, LAURA
GIES, JOHN HINSHAW, AND JOHN AND JANE DOES, the
last two named being fictitious names, the real names of such
persons being currently unknown but who are active in
defendant organizations or act in concert with the above-named
individuals to engage in, or who will engage in, the conduct
complained of herein,

Declaration

Defendants.

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Mr. Ronald Lyman, pursuant to 28 U.S.C. § 1746, hereby declares:


1. I respectfully submit this Declaration in support of the *State of New York's Motion for Contempt*. I am familiar with the matters set forth herein from personal knowledge.
2. I am the Director of Security for the Planned Parenthood of Greater New York ("PPGNY"). I have been in this position since February, 2019. In this role, I oversee all aspects of security of 26 Planned Parenthood Health Centers throughout the New York City area and several upstate counties.
3. Prior to this role, I was employed as a special agent for the Federal Bureau of Investigations for twenty-five years.
4. As Director of Security, I manage the security officers on staff, whose responsibilities include conducting bag inspections and screening patients and staff through the metal detectors. I devise and oversee trainings for security officers and staff, purchase security devices, check systems, and update clinic security systems as-needed. I am based out of a Health Center on Bleecker Street in downtown New York, and here I monitor protest activity to ensure the safety of patients and staff, and serve as a liaison to the police.

5. In support of the Attorney General's successful Motion for Preliminary Injunction, I identified Red Rose Rescue members Christopher Moscinski and Laura Gies as regular fixtures at the Bleecker Street Center. Moscinski and Gies' disruptive and illegal activities at the Center caused us to pour extra staff time, extra money, and extra staff attention into security.
6. I receive information from the Planned Parenthood Federation of America Global Safety and Security team about potential threats to PPGNY clinics that they have identified online, including through social media accounts. I also routinely meet with security management of Planned Parenthoods statewide and nationally to discuss trends, techniques, and new initiatives.
7. I am very familiar with the organization identified as Red Rose Rescue. Red Rose Rescue commits FACE Act violations, under the guise of peaceful protesting. They are a significant security concern for PPGNY facilities and all health clinics nationwide, as they seek to avoid security measures so that they can sneak into clinics undetected, obstruct doorways, create chaos, and try and halt the provision of abortions in our facilities.
8. Throughout my time as Director of Security, my team has raised concerns about another Red Rose Rescue member, who goes by the name Bernadette Patel. Patel has frequented our health clinics in New York City and targeted patients entering the facilities for at least the past year.
9. Based on the staff's concern about her ongoing interference with patients in New York City, I asked the Planned Parenthood Federation of America Global Safety and Security team for any publicly available information they could find about her. I learned that Patel's real name is Brianna Mangat; that she has described herself online as both a pro-life activist and a member of Red Rose Rescue; and that she appears to run the organization's social media pages and regularly posts on them.
10. I also learned that Patel previously invaded a health care clinic in Michigan and disrupted operations at a health care center in Washington, DC.
11. On January 6, 2024, a security guard alerted me that Patel was at the Bleecker Street Center, interfering with patients within fifteen feet of the facility's main entrance for over an hour in the morning.
12. The Planned Parenthood - Manhattan Health Center is located at 26 Bleecker Street, in Manhattan, NY, at the corner of Bleecker and Mott Streets.
13. Attached as Exhibit 1 is a true and accurate photo of the Bleecker Street Center.
14. On Mott Street, the sidewalk is approximately thirteen feet wide. The distance from the main entrance to the curb cut extends approximately fifteen feet. On Bleecker Street, the sidewalk is approximately sixteen feet.

15. Exhibit I to the Pullman Declaration is a true and accurate photo of Patel outside the main entrance at the Bleecker Street Center. She is less than five feet from the doorway entrance in this photo.
16. As seen in Exhibit I, Patel wore a pink vest resembling the vests of our health center escorts at the Bleecker Street Center that day, as she often does, in order to confuse patients approaching the clinic as to whether she was there to help them inside or prevent them from entering. She was following patients as they entered the clinic, coming within feet of the main entrance.
17. Exhibit J is a true and accurate photo from a social media post, dated January 6, 2024, of Patel outside the Bleecker Street Center.
18. As seen in Exhibit J, Patel positioned herself on the corner of the building by the curb cut, which is less than ten feet from the main entrance.
19. On August 15, 2024, my staff informed me that Patel showed up at the same Bleecker Street Center and interfered with patients for approximately two hours in the morning.
20. Exhibit K to the Pullman Declaration is a true and accurate photo of Patel outside the main entrance at the Bleecker Street Center.
21. As seen in Exhibit K, Patel came within feet of the facility entrance, approaching patients and handing out literature. My staff informed me that during that time, Patel repeatedly followed and crowded patients, trying to speak into their ears and give them pamphlets, as they attempted to avoid her and enter the building.
22. Patel positioned herself on the corner of the building by the curb cut and then closely followed patients all the way to within feet of the doorway entrance, as health center escorts opened the door to let them in.
23. Patel has also interfered with patients near the entrance to the Court Street Center in Brooklyn, NY.
24. The Planned Parenthood – Joan Malin Brooklyn Health Center is located at 44 Court Street in Brooklyn, NY, on the fourth floor of the building.
25. There are three steps leading up to the main entrance, surrounded by two columns. The width of the sidewalk in front of the building is approximately 16.5 feet.
26. Attached as Exhibit 2 is a true and accurate photo of the Court Street Center.
27. On January 13, 2024, my staff informed me that Patel knowingly and repeatedly interfered with patients within fifteen feet of the doorway and walkway entrances of the Court Street Center for over an hour.

28. Exhibit L at 5 to the Pullman Declaration is a true and accurate photo of Patel from a social media post, dated January 13, 2024, in which she is seen standing directly next to a health center escort, within feet of the clinic steps, outside the main entrance of the Court Street Center.
29. In Exhibit L at 2, Patel is shown crowding and following a patient entering the facility while handing out literature. Patel is wearing a pink vest in imitation of the actual escorts.
30. On August 10, 2024, my staff informed me that Patel showed up at the same Court Street Center and interfered with patients for over an hour that morning.
31. Exhibit N to the Pullman Declaration is a true and accurate photo of Patel outside the main entrance at the Court Street Center.
32. In Exhibit N, Patel is standing mere feet from the doorway entrance, in order to confront patients entering the building.
33. Exhibit P to the Pullman Declaration is a true and accurate video from a social media post, dated August 10, 2024, which shows Patel outside the main entrance, less than several feet from the clinic steps, at the Court Street Center.
34. Exhibit P also shows a group of anti-abortion protesters praying close to the curb, about sixteen feet from the entrance.
35. Exhibit O to the Pullman Declaration is a true and accurate photo from a social media post, dated August 10, 2024, which shows Patel kneeling and praying within a few feet from health center escort and the clinic steps.
36. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed: New York, New York
August 26, 2024



Ronald Lyman